

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES ST. LOUIS,

PLAINTIFF,

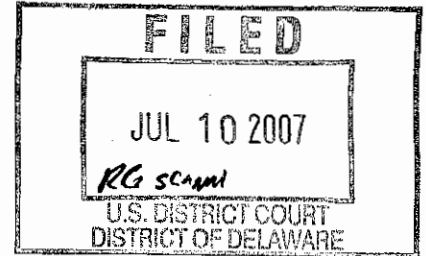
v.

LT. CHERYL MORRIS, et al,

DEFENDANTS.

C.A. NO. 06-236-SLR

JURY TRIAL REQUESTED



PLAINTIFFS' FIRST SET OF INTERROGATORIES DIRECTED TO DEFENDANTS

PLAINTIFF HEREBY DEMANDS FULL AND COMPLETE ANSWERS TO THE FOLLOWING INTERROGATORIES UNDER OATH WITHIN THIRTY DAYS. THESE INTERROGATORIES ARE CONTINUING AND REQUIRE THAT SUPPLEMENTAL RESPONSES BE FILED IN ACCORDANCE WITH THE FEDERAL RULES OF CIVIL PROCEDURES.

INTERROGATORIES

1. When addressing formation with at least (5) officer's present Ms. Boring said to all present "now that Lt. Morris is back 'our' vacation is over".
 - (a) What did she mean?
 - (b) Does she believe Morris is a deficit to the kitchen and things would Run smoother with out her interference?
2. When, multiple times, plaintiff met with Lt. LeGates and he told him everything that was going on with constitutional violations and Lt. Morris why did Lt. LeGates just tell him to write everything down and after his release bring it to the attention of the prison officials against Lt. Morris instead of protecting the rights of the inmates and securing their constitutional rights?
3. Ms. Boring as per Officer Bradley's investigation, did you tell him that Lt. Morris ordered you to write plaintiff up against your own wishes?

4. Ms. Boring have you ever brought an contraband into the kitchen and given it to an inmate?

5. Lt. Morris have you ever brought any contraband, such as food , into the prison and shared it with an inmate?

6. Mr. Klein when plaintiff addressed the issue of guards not having their temperature gauges and had you order (2) so that the cooks (inmates) could make sure the correct temperatures are met did you address this violation with your guards?

7. Mr. Knight when you were in the kitchen and had inmate Williams do the inmate duties and placement for their jobs and supervise them with reports to you as to who, what and why along with suggestions to terminations did you know it was a violation of federal law or were you just ignorant of what the law says?

8. Mr. Klein when Officer Heverin said that the practice of an inmate being in charge and supervising other inmates, as acknowledged by Lt. Morris, was a violation of prison policy and a constitutional violation did you correct the situation or just ignore the violation?

9. Mr. Klein upon reporting to Mr. Knight about the meeting with Officer Heverin has Mr. Knight made changes to insure inmate's constitutional rights?

10. All defendants identify all criminal convictions in the past 15 years including courts, jurisdiction, date of convictions, date of sentencing and all other terms and decisions.

11. All defendants identify all write ups and grievances from inmates in the last 15 years including matters addresses, terms and outcome with all dates.

12. All defendants identify all write ups from prison authorities or prison officers against yourself in the last 15 years including matters, terms and outcome including dates.

13. All defendants have you ever been party to lawsuit(s) other than present one? If so address case, the court where filed, docket number and outcome of case.

14. Mr.(s) Klein and Knight do you both treat inmates and officers with the same respect and applied legal action in accordance with the law? If so describe the Officer Fletcher inmate affair and

what investigation was done and what punishment was handed out not only internally but legally? Also explain the investigation that took place with both Lt. White and Sgt. White and what happen to both the officers and inmates in these cases.

15. Mr. Klein when raises were discussed in the kitchen did you not say a representative would have to be made to represent the rights of the inmates and wasn't the plaintiff the person elected to represent them?

16. Lt. Morris where you approached by any inmate(s) and informed that first cook Govan was threatening them and extorting favors and commissary? What action did you take or say to these allegations?

17. Is it true that since this civil action first cook Govan has been suspended for threatening inmates?

18. Is it true Lt. Lehman that you said to plaintiff after handing him the termination notice, in front of at least (3) cooks and (1) person who puts up food for the MHU and SHU, that if you were he you would file a grievance and not to worry because the truth would eventually come out?

19. Mr.(s) Klein and Knight Do you believe that it is illegal and a constitutional violation to have inmates in charge, schedule, supervise, extort and intimidate other inmates and should be investigated and corrected?

20. Mr. Klein and Mr. Knight Have you ever had to replace a head cook because he was involved with another person from the kitchen in a sexual matter?

21. Lt. Morris have you ever had an inmate make you something special from the kitchen to eat without working over time and share the special meal with that inmate?

22. Lt. Morris did you have the head cook and the second cook interview prospective inmates for third cook positions?

23. Lt. Lehman did plaintiff offer his two week notice to you and you refused to take it?

24. Sgt. Johnson did you meet with Wm. Hawkins and discussed that plaintiff had to be deterred from following through with his law suit because it would cause a lot of problems for inmates and officers?

James St. Louis

JAMES ST. LOUIS #446518

1181 PADDOCK RD.

SMYRNA DE

DATE: 7/5/2007

Certificate of Service

I, James St. Louis, hereby certify that I have served a true
and correct cop(ies) of the attached: ~~interrogatories~~ interrogatories
and discovery upon the following
parties/person (s):

TO: _____ TO: _____
Deputy Attorney General
Dept of Justice
520 N. French 6th Floor
Wilmington, DE 19801

TO: _____ TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United
States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE
19977.

On this 5 day of July, 2007
James St. Louis

IM James St. Jones
SBI# 446518 UNIT Walla East
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Heper
Maid

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19801-3570

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